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11 Attorneys for Defendant and Third-Party Plaintiff
12 Dexon Computer, Inc.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
16

17 CISCO SYSTEMS, INC., a Delaware
corporation and CISCO TECHNOLOGY,
18 INC., a California corporation,
19 Plaintiffs,

20 v.
21 DEXON COMPUTER, INC., a Minnesota
corporation,
22 Defendant.

23
24 AND RELATED CROSS-ACTIONS
25

Case No. 3:20-CV-4926-CRB
**DEFENDANT DEXON'S COMPUTER,
INC.'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

Re: Dexon's Motion to Stay Injunction
Pending Appeal

N.D. Cal. Local Rules 7-11 and 79-5(f)

Judge: Hon. Charles R. Breyer

No Hearing Date Set Pursuant to L.R. 7-11(c)

Hon. Charles R. Breyer
Presiding Judge

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that Defendant and Third-Party Plaintiff Dexon Computer, Inc.
 3 (“Dexon”) will and hereby does move the Court, pursuant to Civil Local Rule 79-5, for an
 4 administrative order to consider whether material contained in its Motion for Stay Injunction
 5 Pending Appeal in the following document or portions thereof, should be sealed. Dexon files this
 6 Administrative Motion to comply with the Parties’ Stipulated Protective Order (Dkt. No. 28), the
 7 Texas Action Protective Order, and Civil Local Rule 79-5.

8 **Material to be Filed Under Seal**

9 Paragraph 13.4 of the Parties’ Stipulated Protective Order, Dkt. No. 28, prohibits a party
 10 from filing in the public record any disclosure or discovery material that is designated
 11 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” (“Protected
 12 Material”) without written permission from the Designating Party or a court order secured after
 13 appropriate notice to all interested persons. As identified herein, material in the documents listed
 14 above has been designated or derives from material that has been designated “CONFIDENTIAL”
 15 or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by Cisco. Dexon makes this
 16 application to consider whether such material should be filed under seal pursuant to Paragraph 13.4
 17 of the Parties’ Stipulated Protective Order and Local Rules 7-11 and 79-5.

18 The following portions of Dexon’s Motion for Stay Injunction Pending Appeal quote,
 19 reference, or otherwise rely on documents designated by Cisco as “CONFIDENTIAL” or “HIGHLY
 20 CONFIDENTIAL – ATTORNEYS’ EYES ONLY”:

21 Page	Line(s)	Designating Entity
22 11	4-6	Cisco

23
 24 A [Proposed] Order is submitted herewith.
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 27
 28

1 Dated: October 23, 2023

CONKLE, KREMER & ENGEL, PLC

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By: /s/ Amanda R. Washton

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Attorneys for Defendant and Third-Party

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Plaintiff Dexon Computer, Inc.

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